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Nathan Horowitz, Esq. Hearing Date: 8/22/17 Attorney for the Debtor Hearing Time: 10:00 a.m. One Barker Avenue, 3d Floor White Plains, New York 10601 (914) 684-0551 nathan@nathanhorowitzlaw.com UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK In re: Chapter 11 M2J2 LLC, Case No. 16-22876 (rdd) Debtor. -----X

## NOTICE OF DEBTOR'S APPLICATION SEEKING TO SELL CERTAIN REAL PROPERTY PURSUANT TO 11 USC § 363(f); AND APPROVING PAYMENT OF EXPENSES, INCLUDING BROKER COMMISSION AND LEGAL FEES, AT CLOSING

PLEASE TAKE NOTICE that upon the application of M2J2 LLC,, ("Debtors"), by their attorney, Nathan Horowitz, Esq., a hearing shall be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601 on August 22, 2017, at 10:00 a.m., seeking the following relief:

an Order, pursuant to 11 USC 105, 361, 362 and 363, allowing the Debtor to sell real property at 97 Bedford Banksville Road, Bedford, New York., free and clear of liens and alleged liens; and to approve payment of brokers' commissions, legal fees and other costs of closing title; and to preserve Debtors' exemption in the net proceeds.

## Professionals to be paid:

Broker: 6% or \$123,000.00

Legal Fees: \$4,500.00

A COMPLETE COPY OF THE APPLICATION, AND EXHIBITS, MAY BE OBTAINED THROUGH THE COURT'S PACER SYSTEM, OR BY WRITTEN REQUEST TO DEBTOR'S COUNSEL.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief the Debtor seeks to obtain must be in writing, conform to the requirements of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules of the United States Bankruptcy Court for the Southern

District of New York, and must be filed and served no later than three (3) business day prior to the hearing Date ("Objection Deadline").

PLEASE TAKE FURTHER NOTICE that pursuant to General Order M-242, any objection filed by parties with representation shall be filed on or before the Objection Deadline (i) through the Bankruptcy Court's Electronic Filing System which may be accessed at the Bankruptcy Court's internet web at http://www.nysb.uscourts.gov, and (ii) in portable document format (PDF) using Adobe Exchange Software for conversion.

PLEASE TAKE FURTHER NOTICE that any party that is either without legal representation, or that is unable to file documents electronically or create documents in PDF format, shall file its objection on or before the Objection Deadline in either Word, WordPerfect or DOS text (ASCII) format on 3-1/2" floppy diskette in an envelope clearly marked with the case name, case number, type and title of document, document number of the document to which the objection refers and the file name of the documents.

PLEASE TAKE FURTHER NOTICE that a "hard copy" of any objections must be delivered to the Chambers of the Honorable Robert D. Drain at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601 on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that objections, if any, must be served in accordance with the provisions of General Order M-242 so that they are received on or before the Objection Deadline by Nathan Horowitz, Esq., attorney for the Debtor, at One Barker Avenue, 3d Floor, White Plains, New York 10601

Dated: White Plains, New York July 19, 2017

> /s/ Nathan Horowitz Nathan Horowitz, Esq. Attorney for Debtor One Barker Avenue, 3d Floor White Plains, New York 10601 (914) 684-0551